



Program Requirements Comparison

NATIONAL ENVIRONMENTAL PERFORMANCE TRACK and VIRGINIA ENVIRONMENTAL EXCELLENCE PROGRAM



National Environmental Performance Track and Virginia Environmental Excellence are voluntary programs designed to foster and reward environmental excellence. Performance Track is a national EPA program and Virginia Environmental Excellence is a statewide VADEQ program. This fact sheet summarizes and compares requirements for the Performance Track Program and the top tier of Virginia's Environmental Excellence Program, Exemplary Environmental Enterprise (E3). For additional information on these programs or incentives, see program web sites or contact program coordinators.

Common Program Requirements:

- *EMS Components:* Five required elements include: an EMS with a written policy; planned targets and goals; clear roles and responsibilities for meeting goals; plans for checking and correcting non-conformance issues; and documented management review.
- *EMS Audit/Self-Assessment:* A self-assessment or third party EMS audit is to have taken place at the time of application.
- *EMS Cycle:* Requires full implementation.
- *Scalability:* Requirements are scalable and goals are expected to reflect the size of the facility.
- *Past Performance:* Documentation of past environmental improvements required.
- *Future Performance:* Requires commitments to performance improvement associated with significant environmental impacts and pollution prevention activities.
- *Community Outreach:* Requires a plan to identify and respond to local concerns and inform community of important matters that affect it.
- *Annual Report:* Report must include EMS data, documentation that corrective action has been taken to address compliance and other EMS issues, and progress toward meeting goals.
- *Compliance Record:* Facility must have fewer than three significant civil violations and no unresolved SNCs/SVs, as well as no criminal environmental violations for five years. Facilities with ongoing EPA litigation or EPA debarment are ineligible.
- *Self-Audits:* Annual EMS and compliance audits are required.
- *Site Visits:* Periodic site visits are conducted as part of the program.
- *Duration of Participation:* Membership is for three years.

Virginia Environmental Excellence: Exemplary Environmental Enterprise (E3) - Additional Requirements:

- *Pollution Prevention Program:* Requires a fully implemented pollution prevention program.
- *Annual Report:* Must show that EMS is actively updated from year to year and is a dynamic and continuously improving document.
- *Site Visits:* Requires verification visits with all applicants. Follow-up visits conducted as needed.

Web Site: www.deq.state.va.us/veep/homepage.html
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Performance Track - Additional Requirements:

- *EMS Cycle:* Requires one full cycle including implementation, evaluation, and review.
- *Past Performance:* Requires a demonstration of two years of performance improvements within two specific aspects (e.g., water use, hazardous waste reduction, emissions of VOCs). Small businesses need only report on one aspect.
- *Future Performance:* Requires a commitment to future performance improvements in four specific aspects. Small businesses commit to only two aspects.
- *Community References:* Community references are required (e.g., member of a citizen group, union, local agency).
- *Self-Certification:* Compliance self-certification is required on application and on annual reports.

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